

## **EXHIBIT B**

**IF YOU WERE IN AN ELIGIBLE LGBTQ+ RELATIONSHIP AND AETNA LIFE INSURANCE COMPANY DENIED, OR WOULD HAVE DENIED YOU, COVERAGE FOR ARTIFICIAL INSEMINATION SERVICES SOUGHT OR RECEIVED BETWEEN SEPTEMBER 1, 2017 AND MAY 31, 2024 YOU MAY BE ELIGIBLE FOR APPROXIMATELY \$10,000 OR MORE IN ADDITIONAL COMPENSATION**

This Notice was Authorized by the U.S. District Court for the Southern District of New York  
*Goidel et al., v. Aetna Life Insurance Company*, Case No. 1:21-cv-07619 (VBS)

**WHAT IS THIS ABOUT?**

A proposed settlement has been reached in a class action about whether Aetna Life Insurance Company's ("Defendant," or "Aetna") health insurance policy was discriminatory and denied equal access to insurance coverage for artificial insemination to individuals in LGBTQ+ relationships in the state of New York. The lawsuit, titled *Goidel et al., v. Aetna Life Insurance Company*, Case No. 1:21-cv-07619 (VBS), is pending in the U.S. District Court for the Southern District of New York. In a class action, one or more individuals called "Named Plaintiffs" (in this case Emma Goidel, Ilana Lee, Madeleine Lee, and Lesley Brown) sue on behalf of all others who have similar claims. Aetna denies the allegations, and the Court did not rule in favor of Plaintiffs or Defendant. Rather, the parties agreed to this proposed settlement. **Under the proposed settlement, Class Members may receive approximately \$10,000 or more, depending on the number of eligible Class Members.**

**WHO IS INCLUDED?**

Three categories of Class Members are included, all of which are made up of New York members of an Aetna plan who were in an "Eligible LGBTQ+ Relationship," defined as one individual with a uterus and a partner who was incapable of producing sperm due to being an individual who was assigned the female sex at birth, was intersex, or was assigned the male sex at birth and had transitioned or was in the process of transitioning to the opposite gender. (1) Category A Class Members - known by Aetna to have been denied coverage for one of an agreed-upon set of qualifying artificial insemination codes for services between September 1, 2017 and May 31, 2024 ("Class Period") and whose member files contained information indicating that they may be eligible to participate in the settlement; (2) Category B - known to have been denied coverage for a qualifying artificial insemination code during the Class Period but for whom we do not have sufficient information to determine whether they may have been in an Eligible LGBTQ+ Relationship; and (3) Category C - known to have been approved or denied coverage only for an IVF procedure during the Class Period but whose artificial insemination history is unknown and for whom we do not have sufficient information to determine whether they may have been in an Eligible LGBTQ+ Relationship, or individuals unknown to Aetna who underwent eligible artificial insemination procedures but who did not submit a request for coverage because they would have been denied and were in an Eligible LGBTQ+ Relationship at the time. If you received Notice in the mail you are believed to be a potential Class Member.

**WHAT DOES THE SETTLEMENT PROVIDE?**

**Class Members may receive a payment of approximately \$10,000.** Aetna will create a \$2,000,000 Common Fund to pay Class Members in exchange for settling the claims raised. If there are more than 200 Class Members, Class Members may receive less

than \$10,000. Category A Class Members will automatically receive this amount without taking any action. The requirements Category B and C Class Members must satisfy can be found online at [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com) and on the form(s) enclosed with this Notice.

Class Members may also complete Out-of-Pocket Expense Submissions and Miscellaneous Harm Submissions to be considered by a Special Master. Out-of-Pocket and Miscellaneous Harm awards will be paid as determined by the Special Master only if there are Common Funds remaining after all participating Class Members receive their approximate \$10,000 payment.

Class Members may also be entitled to receive a \$2,300 "Dollars for Benefits" payment as compensation for artificial insemination benefits their individual plans would have paid had Aetna approved their coverage requests if Aetna has not already paid for such services. Class Members who underwent covered infertility treatments during the Class Period that would have exceeded \$2,300 and would have been reimbursed by Aetna, may submit a Proof of Greater Covered Care submission for additional Dollars for Benefits funds at Aetna's sole discretion.

**WHAT ARE MY OPTIONS?**

(1) Remain in the Class and complete the forms necessary to receive compensation, as applicable to your Class Category. You can't sue Aetna over the claims settled in this case, will be legally bound by the Court's orders, and will be unable to participate in other class action lawsuits against Aetna regarding the claims at issue in this case. (2) Request exclusion from the settlement as set out in the Long Form Notice and online. You will not receive any money but will retain your right to sue Aetna if you choose. (3) Object and inform the court why you do not agree with the terms of the settlement as set out in the Long Form Notice and online. You must remain a Class Member and may request to speak at the Final Approval Hearing if you wish.

**Forms, Submissions, Exclusion Requests, and Objections must be received on or before Bar Date. Please visit [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com) for more details.**

**WHEN WILL I GET PAID?**

The Court will hold a Final Approval Hearing at TIME on DATE to consider whether the Settlement is fair, reasonable, and adequate. Payments cannot be dispersed until after the Court approves the Settlement. Please be patient.

**DO I HAVE A LAWYER?**

Emery, Celli, Brinckerhoff, Abady, Ward & Maazel, LLP, and the National Women's Law Center are representing the Class. You may hire your own lawyer, but it is not required.

Scan Code for More Info

**DISPLAY  
WEBSITE QR  
CODE**

Or to File Online Forms

## LEGAL NOTICE

**IF YOU WERE IN AN ELIGIBLE LGBTQ+ RELATIONSHIP AND AETNA LIFE INSURANCE COMPANY DENIED, OR WOULD HAVE DENIED YOU, COVERAGE FOR ARTIFICIAL INSEMINATION SERVICES SOUGHT OR RECEIVED BETWEEN SEPTEMBER 1, 2017, AND MAY 31, 2024, YOU MAY BE ELIGIBLE FOR APPROXIMATELY \$10,000 IN COMPENSATION FROM A CLASS ACTION LAWSUIT**

This Notice was authorized by the U.S. District Court for the Southern District of New York  
*Goidel et al., v. Aetna Life Insurance Company*, Case No. 1:21-cv-07619 (VBS)

**WHAT IS THIS ABOUT?**

A proposed settlement has been reached in a class action lawsuit about whether Aetna Life Insurance Company's ("Defendant" or "Aetna") clinical policy bulletin's definition of infertility was discriminatory and denied equal access to insurance coverage for artificial insemination to individuals in LGBTQ+ relationships in the state of New York. The lawsuit, titled *Goidel et al., v. Aetna Life Insurance Company*, Case No. 1:21-cv-07619 (VBS), is pending in the U.S. District Court for the Southern District of New York. **Under the proposed settlement, Class Members may receive approximately \$10,000 or more, depending on the number of eligible Class Members.**

**WHO IS INCLUDED?**

Individuals who were New York members of an Aetna commercial plan that sought or could have sought coverage for artificial insemination (intracervical insemination ("ICI") or intrauterine insemination ("IUI")) services received between September 1, 2017, and May 31, 2024 (the "Class Period"), for which coverage was or would have been denied by Defendant and who were in an Eligible LGBTQ+ Relationship at that time may be eligible to participate and receive compensation from this settlement. For purposes of this settlement, an "Eligible LGBTQ+ Relationship" consists of one individual with a uterus and a partner who was incapable of producing sperm due to being an individual who was assigned the female sex at birth, was intersex, or was assigned the male sex at birth and had transitioned or was in the process of transitioning to the opposite gender. Some, but not all, Class Members' files contained information regarding their artificial-insemination history and some, but not all, Class Members' files contained information indicating that they may have been eligible to participate in the settlement. Some Class Members may have never submitted requests for coverage (a precertification request or claim) to Aetna, but they may still be eligible to participate if they underwent artificial insemination during the Class Period and were in an Eligible LGBTQ+ Relationship at the time. However, the requirements for participating in the settlement vary. **If you believe you are eligible to participate and you did not receive a Notice by mail, please visit the settlement website at [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com) for more details.**

**WHAT DOES THE SETTLEMENT PROVIDE?**

**Class Members may receive an approximate payment of \$10,000**, with additional compensation options and reimbursement for unpaid fertility treatment expenses. If there are more than 200 Class Members, Class Members may receive less than \$10,000. Only a limited category of Class Members will automatically receive this amount. Other Class Members will be required to submit an **Attestation Form and Claim Form, as applicable, to qualify for compensation.** The requirements for Class Members to receive compensation can be found online at [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com).

Class Members may complete optional Out-of-Pocket Expense Submissions and Miscellaneous Harm Submissions to be eligible to receive additional compensation, in an amount to be determined by a Special Master, **only** if there are funds remaining after all participating Class Members receive their \$10,000 payment.

Class Members for whom Aetna has not already paid for artificial-insemination benefits their individual plans would have covered may be entitled to an additional \$2,300 ("Default Dollars for Benefits Amount"). Class Members who underwent covered artificial inseminations during the Class Period that would have exceeded \$2,300 in benefit dollars may submit a Proof of Greater Covered Care submission for additional compensation, at Aetna's sole discretion.

**WHAT ARE MY OPTIONS?**

(1) Complete the forms, if applicable to your Category, to be eligible for compensation. You can't sue Aetna over the claims settled in this case and will be legally bound by the Settlement and will be unable to participate in other class action lawsuits against Aetna regarding the claims at issue in this case. (2) Request exclusion from the settlement as set out in the Long Form Notice and online. You will not receive any money but will retain your right to sue Aetna if you choose. (3) Object and inform the court why you do not agree with the terms of the settlement, as set out in the Long Form Notice and which can be found online on the Settlement website. You must remain a Class Member and may request to speak at the Final Approval Hearing if you wish.

**Forms, Submissions, Exclusion Requests and Objections must be received on or before Bar Date. Please visit [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com) for more details.**

**WHEN WILL I GET PAID?**

The Court will hold a Final Approval Hearing at TIME on DATE to consider whether the Settlement is fair, reasonable, and adequate. Payments cannot be dispersed until after the Court approves the Settlement. Please be patient.

**WHERE CAN I GET MORE INFORMATION?**

Additional information, details on the various Class Member categories and requirements, access to Court documents and online form submissions are available on the Settlement website at [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com). Or you can contact the Settlement Administrator by email at [InfertilityInsuranceSettlement@atticusadmin.com](mailto:InfertilityInsuranceSettlement@atticusadmin.com), by phone at 1-800-205-6861, by or by mail at Infertility Insurance Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164. Para española, visit el sitio web del acuerdo en [www.InfertilityInsuranceSettlement.com](http://www.InfertilityInsuranceSettlement.com).

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